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May 15, 2023

The Judge Colleen McMahon, USDJ  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: *Roe et al v. CNTP MCB Inc.*  
Docket Number 21-CV-468

Dear Judge McMahon:

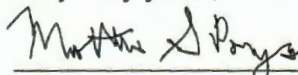
As the Court knows, this firm represents all Plaintiffs herein. I write to respectfully request additional time to file a new motion for default judgment with the appropriate proofs.

This Honorable Court undoubtedly recalls that it previously denied Plaintiffs' motion for a default judgment due to a lack of supporting proof. See ECF Docket Entry 25. Plaintiffs and I have been working on the steps necessary to remedy that issue. In addition, I have been having detailed discussions with possible co-counsel about working with my firm on this action, starting as soon as possible, with the hope and understanding that said co-counsel could help expedite this motion and the successful conclusion of this action.

Therefore, Plaintiffs and I respectfully request that Plaintiffs be afforded sixty more days, until July 14, 2023, to file a new motion for default judgment with the appropriate proofs. Plaintiffs and I fully intend to prosecute this action, despite the delays.

Plaintiffs and I thank this Honorable Court for its time and its courtesies.

Very truly yours,



MATTHEW S. PORGES, ESQ.

MEMO ENDORSED

OK

Colleen McMahon  
5/15/2023